



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*26 Federal Plaza, 37th Floor
New York, New York 10278*

March 6, 2025

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs, 24 Cr. 542 (AS)*

Dear Judge Subramanian:

The Government respectfully submits this letter regarding the S2 Indictment returned today in the above-referenced case by a Grand Jury sitting in this District (the “S2 Indictment”).

The S2 Indictment contains no new charged offenses but includes additional allegations related to the racketeering conspiracy charged in Count One. Specifically, the S2 Indictment contains additional allegations as to the means and methods of the racketeering enterprise related to forced labor. (*See* S2 Indictment ¶ 12(i)). The Government expects to provide defense counsel with a supplemental Enterprise Letter related to these allegations by March 10, 2025. The Government has already produced Rule 16 discovery associated with the S2 Indictment and does not expect the S2 Indictment to affect existing pre-trial deadlines. The Government respectfully requests that the defendant be arraigned on the S2 Indictment at the conference scheduled for March 14, 2025.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: _____ /s
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cc: Counsel of record (by ECF)